

SealedPublic and unofficial staff access
to this instrument are
prohibited by court order.

AO 91 (Rev. 02/09) Criminal Complaint

Felony

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States District Court
Southern District of Texas
FILED

DEC 10 2020

United States of America)

v.)

Ramon ZAMORANO)

Case No. B-20-MJ-914

David J. Bradley, Clerk of Court

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

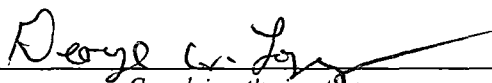
On or about the date of April 13, 2020 in the county of Cameron in the Southern District of
Texas, the defendant violated 18 U. S. C. § 554 and 371
an offense described as follows:

Knowingly conspired to export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: one (1) .223/5.56 caliber AR-15 type rifle and one (1) 5.56 caliber magazine.


This criminal complaint is based on these facts:

On April 13, 2020, United States Customs and Border Protection Officers (CBPOs) at Gateway Port of Entry, Brownsville, TX, encountered Ramon ZAMORANO attempting to depart the United States driving a 2019 Chevrolet Camaro. CBPOs conducted an outbound inspection of ZAMORANO and ZAMORANO gave a negative declaration for money, ammunition, and firearms. A secondary inspection of his vehicle revealed one (1) .223/5.56 caliber AR-15 type rifle in concealed in the spare tire well in the trunk of his vehicle. In addition, CBPOs discovered one (1) 5.56 caliber magazine in ZAMORANO's pants pocket.

Homeland Security special agents interviewed ZAMORANO and he admitted he was to deliver the firearm and magazine to an individual in Matamoros, Tamaulipas, Mexico, for a payment of \$100.00. ZAMORANO subsequently stated that he knew it was illegal to take firearms into Mexico and that he has never applied for a license to export firearms to Mexico.

☐ Continued on the attached sheet
Complainant's signatureGeorge Lopez, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: December 10, 2020City and state: Brownsville, Texas
Judge's signature
Ronald G. Morgan, U.S. Magistrate Judge
Printed name and title